

November 4, 2016

CELA

Jeff S. Jordan Office of General Counsel Federal Election Commission 999 E Street, N.W. Washington, DC 20463

Re:

**MUR 7154** 

Dear Mr. Jordan:

I write in my capacity as both Treasurer and Counsel to Beatty for Congress (FEC C00507368) in response to the complaint filed by Kathleen M. Eagan (the "Complaint").

I will initially note that neither Beatty for Congress, nor Congresswoman Joyce Beatty (FEC H20H03125) were named as Respondents in the Complaint.

Instead, the Complaint was filed against the Ohio Democratic Party generally alleging violations resulting from the publication and mailing of a brochure (Complaint Exhibit A) and the online posting of sample ballots and/or slate cards Complaint Exhibit B, C and D; the allegations claim that ODP failed to include the applicable disclaimer(s) required under CFR 110.11 for public communications made by a committee.

Although Beatty for Congress is neither a named Respondent, nor did Beatty for Congress pay for or otherwise publish Exhibits A – D, I am requesting an extension of time in which to file a formal response to the Complaint.

Beatty for Congress would like the opportunity to fully participate in the defense of these allegations. As such, additional time is required to investigate and collect all facts and information related to the Complaint, including discussions with the publisher of Complaint Exhibits A – D, the Ohio Democratic Party.

It is my understanding that the Ohio Democratic Party has obtained an extension of time to December 16, 2016 to respond to the Complaint.

Beatty for Congress requests a similar extension of time.

Jeffrey A. Ruppert

Attorney and Counselor at Law

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Please do not hesitate to contact me if you have any questions or concerns about the foregoing.

I look forward to your reply.

Best regards.

fiefirey A. Ruppert Treasurer & Counsel, Beatty for Congress



## FEDERAL ELECTION COMMISSION 999 E Street, NW Washington, DC 20463

## STATEMENT OF DESIGNATION OF COUNSEL Please use one form for each Respondent/Entity/Treasurer FAX (202) 219-3923

MUR#	7154			·	
NAME OF	F COUNSEL: Jeffrey A. Ruppert				
FIRM:		he Ruppert Co., LLC			
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	y behalf befo	re the Commission		ations from the Commis Treasurer	sion and to
Date	Res	ppndent Agent -S	ignature ,	Title(Treasurer/Candid	late/Owner)
RESPON	IDENT: B	eatty for Congre	ess		
	(Comm	•	. •	dual Named in Notificati Columbus, OH 43215	on Letter)
	TELEPHON	•		· · · · · · · · · · · · · · · · · · ·	
	RI	ISINESS (614)	423-9461		

Information is being sought as part of an investigation being conducted by the Federal Election Commission and the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) apply. This section prohibits making public any investigation conducted by the Federal Election Commission without the express written consent of the person under investigation